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November 20, 2007

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *In re Leased Commercial Access; Development of Competition and Diversity in Video Programming Distribution and Carriage*, MB Dkt. No. 07-42

Dear Ms. Dortch:

On November 19 and 20, James Coltharp and Mary McManus of Comcast Corporation contacted Rick Chessen, Senior Legal Advisor and Legal Advisor for Media Issues to Commissioner Michael J. Copps; Rudy Brioché, Legal Advisor for Media Issues to Commission Jonathan S. Adelstein; Cristina Chou Pauzé, Legal Advisor to Commissioner Robert M. McDowell; and Amy Blankenship, Legal Advisor to Commissioner Deborah Taylor Tate, to discuss the above-referenced proceeding.

In these conversations, Mr. Coltharp and Ms. McManus highlighted the principal arguments that Comcast presented in its comments and reply comments concerning both leased access and program carriage issues. We also discussed the vague and open-ended nature of the questions in the Notice of Proposed Rulemaking, the late-filed proposals and assertions that have recently been submitted regarding both sets of issues, and the infirmities of basing burdensome new regulations on the basis of the current record. We explained that it is impossible for interested parties to provide meaningful comments on information and arguments that are not included in the public record. We urged the Commission to avoid a rush to judgment and provide the opportunity for its proposals to be reported and tested through an adversarial process.

Please contact me with any questions about this submission.

Respectfully submitted,

/s/ James Coltharp  
James Coltharp

Cc: Rick Chessen  
Rudy Brioché  
Cristina Chou Pauzé  
Amy Blankenship